

LAURIE ANN ALI,
Plaintiff,
v.

STIPULATION AND ORDER FOR EXTENSION OF TIME

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

1 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security
2 (the "Commissioner"), shall have an extension of time to respond to Plaintiff's Complaint in this case.
3 In support of this request, the Commissioner respectfully states as follows:

4 1. Defendant's response to Plaintiff's Complaint is due October 31, 2022. Defendant has
5 not previously requested an extension of this deadline.

6 2. The certified administrative record (CAR) in this case has not been finalized for filing.
7 The agency's Office of Appellate Operations (OAO) is responsible for preparation of CARs. Counsel
8 for the Commissioner is in contact with OAO to ensure that the CAR is properly certified for filing. OAO
9 has indicated it needs additional time to prepare the CAR, accordingly, Defendant requests an extension
10 of 60 days to respond to Plaintiff's Complaint.

11 3. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that she
12 has no objections.

13 4. This request is made in good faith and is not intended to delay the proceedings in this
14 matter.

15 WHEREFORE, Defendant requests until December 30, 2022, respond to Plaintiff's Complaint.

16 Respectfully submitted,

17
18 Date: October 31, 2022

18 By: /s/ *Jonathan Omar Pena
19 Jonathan Omar Pena
20 Pena & Bromberg, Attorneys at Law
21 *Authorized by email on October 31, 2022
22 Attorneys for Plaintiff

23 Date: October 31, 2022

23 PHILIP A. TALBERT
24 United States Attorney
25 Eastern District of California

26 By: /s/ Oscar Gonzalez de Llano
27 OSCAR GONZALEZ de LLANO
28 Special Assistant United States Attorney
Attorneys for Defendant

ORDER

Based upon the foregoing stipulation of the parties, erroneously docketed as a motion (Doc. 11), and for good cause shown (Fed. R. Civ. P. 16(b)(4)),

IT IS HEREBY ORDERED that Defendant shall have an extension of time, to and including December 30, 2022, to file the certified administrative record. All other deadlines set forth in the Scheduling Order (Doc. 5) shall be extended accordingly.

IT IS SO ORDERED.

Dated: **October 31, 2022**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE